

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

EARL PARRIS, JR., individually, and  
on behalf of a Class of persons  
similarly situated,

*Plaintiff, and*

CITY OF SUMMERVILLE, GA.,

*Intervenor Plaintiff,*

v.

3M COMPANY, DAIKIN  
AMERICA, INC., HUNTSMAN  
INTERNATIONAL, LLC, PULCRA  
CHEMICALS, LLC, MOUNT  
VERNON MILLS, INC., TOWN OF  
TRION, GEORGIA, RYAN  
DEJUAN JARRETT, and E.I. DU  
PONT DE NEMOURS AND  
COMPANY; and THE CHEMOURS  
COMPANY;

*Defendants.*

CIVIL ACTION FILE NO.:  
4:21-cv-00040-TWT

**INTERVENOR PLAINTIFF CITY OF SUMMERVILLE, GEORGIA  
JOINDER IN PLAINTIFF'S SECOND AMENDED INDIVIDUAL AND  
CLASS ACTION COMPLAINT**

COMES NOW, the Intervenor-Plaintiff in this case, the City of Summerville, Georgia ("Summerville" or "City"), and HEREBY joins in the filing of Plaintiff's Amended Complaint, adding E.I. DU PONT DE NEMOURS AND COMPANY

(“Dupont”) and THE CHEMOURS COMPANY (“Chemours”) as additional parties, pursuant to the Scheduling Order [Doc. 187], Fed. R. Civ, P. 15 and LR 15 NDGa. Summerville furthers adopts and incorporates the relevant provisions of Plaintiff’s Second Amended Individual and Class Action Complaint [Doc. 280] and new allegations against DuPont and Chemours by reference.

**RELIEF DEMANDED**

WHEREFORE, Summerville respectfully requests this Court grant the following relief:

- a) Enter Judgment in its favor;
- b) Award Summerville damages in an amount to be determined by a jury sufficient to compensate it for real property damage, out-of-pocket expenses, lost profits and sales, and future expenses;
- c) Issue an injunction requiring Defendants to abate their nuisance and/or otherwise remove their chemicals from Summerville’s water supply and to prevent these chemicals from continuing to contaminate Summerville’s water supply;
- d) Award punitive damages;
- e) Award attorney fees and costs and expenses incurred in connection with the litigation of this matter; and

f) Award such other and further relief as this Court may deem just, proper, and equitable.

**JURY DEMAND**

**SUMMERVILLE HEREBY DEMANDS A TRIAL BY JURY ON ALL ISSUES OF THIS CAUSE.**

Respectfully submitted this the 21<sup>st</sup> day of November, 2022.

/s/ J. Anderson Davis

J. Anderson Davis (Ga. Bar No. 211077)  
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/s/ Jeffrey E. Friedman

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Northern District of Georgia Civil Local Rule 7.1.D., the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the within and foregoing **Intervenor Plaintiff City of Summerville, Georgia Joinder in Plaintiff's Second Amended Individual and Class Action Complaint** was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 21<sup>st</sup> day of November, 2022.

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*/s/ J. Anderson Davis*  
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